

LTL ATTORNEYS LLP

Enoch H. Liang (SBN 212324)
601 Gateway Boulevard, Suite 1010
South San Francisco, California 94080
Tel: 650-422-2130
Fax: 213-612-3773
enoch.liang@ltmlattorneys.com

James M. Lee (SBN 192301)
Caleb H. Liang (Bar No. 261920)
300 S. Grand Ave., 14th Floor
Los Angeles, California 90071
Tel: 213-612-8900
Fax: 213-612-3773
james.lee@ltmlattorneys.com
caleb.liang@ltmlattorneys.com

HUNG G. TA, ESQ. PLLC

Hung G. Ta (*pro hac vice*)
JooYun Kim
250 Park Avenue, 7th Floor
New York, New York 10177
Tel: 646-453-7288
hta@hgtlaw.com
jooyun@hgtlaw.com

Lead Counsel for Court-Appointed Lead Plaintiff and the Class

[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE TEZOS SECURITIES LITIGATION

This document relates to:

ALL ACTIONS.

Master File No. 17-cv-06779-RS

CLASS ACTION

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO ADD NEW PLAINTIFF**

Judge: Hon. Richard Seeborg

WHEREAS, Lead Plaintiff Arman Anvari filed a Consolidated Complaint (“Complaint”) (Dkt. No. 108) against Dynamic Ledger Solutions, Inc. (“DLS”), Tezos Stiftung, (“Tezos Foundation”), Kathleen Breitman, Arthur Breitman, Timothy Cook Draper (“Draper”), Draper Associates V Crypto LLC (“Draper Associates Crypto”) and Bitcoin Suisse AG (“Bitcoin Suisse”);

WHEREAS, on August 7, 2018, and August 31, 2018 the Court issued orders (Dkt. Nos. 148 and 163) granting the motions to dismiss the Complaint filed by Draper, Draper Associates Crypto and Bitcoin Suisse, and dismissing these Defendants from this action with prejudice;

WHEREAS, on September 14, 2018, DLS, the Tezos Foundation, Kathleen Breitman and Arthur Breitman (collectively, “Defendants”) filed their answers (Dkt. Nos. 168-171) to the Complaint;

WHEREAS, on November 21, 2018, Pumaro LLC (“Pumaro” and together with Arman Anvari, “Plaintiffs”) was added as a named plaintiff, pursuant to a stipulation and order (Dkt. No. 183);

WHEREAS, Plaintiffs seek to add Artiom Frunze as a plaintiff to this action; and

WHEREAS, Plaintiffs and Defendants have agreed that Artiom Frunze may be added to the Complaint without the need to file an amended pleading and, therefore, amended answers by Defendants;

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of Plaintiffs and Defendants that:

(a) The Complaint is amended to add plaintiff Artiom Frunze and the following allegation as paragraph 14b:

Plaintiff Artiom Frunze is an individual who invested 238 Ethereum in the Tezos ICO on July 2, 2017 and July 3, 2017. He was promised delivery of 165,607.38 Tezos tokens upon the conclusion of the Tezos ICO and the launch of the Tezos network.

(b) Defendants, and each of them, answer paragraph 14b as follows :

Defendants are without sufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 14b pertaining to Artiom Frunze’s alleged contribution to the Fundraiser, and on that basis deny them. Except as expressly admitted, Defendants deny each and every remaining allegation of paragraph 14b.

1 Stipulated and agreed to by:

2 Dated: January 4, 2019

3 Respectfully Submitted,

4 LTL ATTORNEYS LLP

DAVIS POLK & WARDWELL LLP

5 By: s/ Enoch H. Liang
 6 Enoch H. Liang
 601 Gateway Boulevard, Suite 1010
 7 South San Francisco, California 94080
 Tel: 650-422-2130
 8 Fax: 213-612-3773
 enoch.liang@ltlattorneys.com

By: /s/ Neal A. Potischman
 Neal A. Potischman
 Serge A. Voronov
 1600 El Camino Real
 Menlo Park, California 94025
 Tel: (650) 752-2000
 Fax: (650) 752-2111
 neal.potischman@davispolk.com
 serge.voronov@davispolk.com

9 James M. Lee
 10 Caleb H. Liang
 LTL ATTORNEYS LLP
 11 300 S. Grand Ave., 14th Floor
 Los Angeles, California 90071
 12 Tel: 213-612-8900
 Fax: 213-612-3773
 james.lee@ltlattorneys.com
 14 caleb.liang@ltlattorneys.com

Edmund Polubinski, III (*pro hac vice*)
 Andrew S. Gehring (*pro hac vice*)
 DAVIS POLK & WARDWELL LLP
 450 Lexington Avenue
 New York, New York 10017
 Tel: (212) 450-4000
 Fax: (212) 701-5800
 edmund.polubinski@davispolk.com
 andrew.gehring@davispolk.com

15 Hung G. Ta (*pro hac vice*)
 16 JooYun Kim
 HUNG G. TA, ESQ., PLLC
 17 250 Park Avenue, 7th Floor
 New York, New York 10177
 18 Tel: 646-453-7288
 Fax: 646-453-7289
 hta@hgtlaw.com
 20 jooyun@hgtlaw.com

Grant P. Fondo (SBN 181530)
 GOODWIN PROCTER LLP
 601 Marshall Street
 Redwood City, California 94063
 Tel: (650) 752-3100
 Fax: (650) 853-1038
 gfondo@goodwinlaw.com

21 *Lead Counsel for Court-Appointed Lead*
 22 *Plaintiff and the Class*

23 William R. Restis
 THE RESTIS LAW FIRM, P.C.
 24 402 West Broadway, Suite 1520
 San Diego, California 92101
 25 Tel: 619.270.8383
 william@restislaw.com

Nicholas A. Reider (SBN 296440)
 GOODWIN PROCTER LLP
 Three Embarcadero Center
 San Francisco, California 94111
 Tel: (415) 733-6000
 Fax: (415) 677-9041
 nreider@goodwinlaw.com

26 Joseph J. DePalma
 27 Bruce D. Greenberg
 28 Jeremy Nash

Daniel P. Roeser (*pro hac vice*)
 Charles A. Brown (*pro hac vice*)
 GOODWIN PROCTER LLP
 620 Eighth Avenue
 New York, New York 10018

LITE DEPALMA GREENBERG,
LLC
570 Broad Street, Suite 1201
Newark, NJ 07102
Tel: (973) 623-3000
Fax: (973) 623-0858
jdepalma@litedepalma.com
bgreenberg@litedepalma.com
jnash@litedepalma.com

Telephone: (212) 813-8800
Facsimile: (212) 355-3333
droeser@goodwinlaw.com
cbrown@goodwinlaw.com

Counsel for Defendant Tezos Stiftung

Additional Counsel for the Class

BAKER MARQUART LLP

COOLEY LLP

By: /s/ Brian E. Klein
Brian E. Klein
Scott M. Malzahn
777 S. Figueroa, Suite 2850
Los Angeles, CA 90017
Tel: (424) 652-7814
Fax: (424) 652-7850
bklein@bakermarquart.com
smalzahn@bakermarquart.com


By: /s/ Patrick E. Gibbs
Patrick E. Gibbs
Jessica Valenzuela Santamaria
3175 Hanover Street
Palo Alto, CA 94304-1130
Tel: (650) 843-5000
Fax: (650) 849-7400
pgibbs@cooley.com
jsantamaria@cooley.com

*Attorneys for Defendants Dynamic Ledger
Solutions, Inc., Kathleen Breitman, and
Arthur Breitman*

*Attorneys for Defendant Dynamic Ledger
Solutions, Inc.*

SO ORDERED:

Dated: January 7, 2019


The Hon. Richard Seeborg
United States District Judge